

**REMARKS**

**Summary of Office Action**

Claims 1 and 4-13 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Park et al. (US 6,870,186).

Claim 2 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Park et al.

Claim 3 stands objected to as being dependent on a rejected base claim but was indicated as allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims.

**Summary of Amendment**

No amendment to claims has been made at this time. A verified translation of the priority application is being submitted herewith. Claims 1-23 remains pending in this application of which claims 1-13 are under further consideration.

**Allowable Subject Matter**

Applicants wish to thank the Examiner for indicating allowable subject matter in claim 3. However, Applicants believe claims 1, 2 and 4-13 are also allowable for the reasons stated below. Therefore, claim 3 has not been rewritten in independent form at this time.

**All Claims Comply With §§102 and 103**

Claims 1 and 4-13 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Park et al. and claim 2 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Park et al. Applicants assert that Park et al. should be removed prior art and

therefore cannot anticipate or render unpatentable claims 1, 2 and 4-13.

The present application claims priority to Korean Patent Application number 2002-0066188 filed on October 29, 2002, at least two months before the §102(e) date of Park et al. (i.e., December 30, 2002). In order to perfect the claimed priority, Applicants file concurrently herewith a verified English translation of the Korean Patent Application number 2002-0066188. Having perfected priority, Applicants submit that Park et al. should be removed prior art and therefore cannot anticipate or render obvious the claimed invention. Hence, Applicants request that the §102 and §103 rejections to claims 1, 2 and 4-13 based on Park et al. be withdrawn.

### **CONCLUSION**

In view of the foregoing, reconsideration and timely allowance of the pending claims are respectfully requested. Should the Examiner feel that there are any issues outstanding after consideration of the response, the Examiner is invited to contact the Applicants' undersigned representative to expedite prosecution. If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

**MORGAN, LEWIS & BOCKIUS LLP**

Dated: June 5, 2006

By: 

Kyle J. Choi

Reg. No. 41,480

Tel: (202) 739-3000; Fax: (202) 739-3001